

THE HONORABLE RICARDO S. MARTINEZ
Trial Date: November 29, 2021

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON

RUSSELL H. DAWSON, Personal
Representative of the Estate of Damaris
Rodriguez; REYNALDO GIL; JOSE
MARTE; A.G.; I.G.; S.G.; D.G.,

Plaintiffs,

v.

SOUTH CORRECTIONAL ENTITY
("SCORE"), a Governmental Administrative
Agency; PENNY BARTLEY; JIM KELLY;
TODD BARKER; BRITTNEY PALMORE;
BRANDON HEATH; PEDRO SANTOS;
MANDI JARAMILLO; WILLIAM WOO;
BENDA SCOTT a/k/a BRENDA SCOTT;
ETHAN GLOVER; CHRISTOPHER FOY;
JANE DORE; COLMINTON ALLEN;
AARON SEIPP; SCORE JOHN DOES 1-
10; NAPHCARE, INC., an Alabama
Corporation; REBECCA VILLACORTA;
HENRY TAMBE; NANCY WHITNEY;
BILLIE STOCKTON; BRITTANY
MARTIN; JESSICA LOTHROP; BROOKE
WALLACE; SALLY MUKWANA; JOAN
KOSANKE; RITA WHITMAN; VIRGINIA
RICHARDSON; NAPHCARE JOHN
DOES 1-10; KING COUNTY, a political
subdivision of the State of Washington;
RAUL ADAMS; LELAND ADAMS;
ALAN TAG,

Defendants.

No. 2:19-cv-01987-RSM

STIPULATION FOR AND ORDER OF
DISMISSAL

[CLERK'S ACTION REQUIRED]

STIPULATION

1 Plaintiffs and the SCORE Defendants have agreed to the dismissal of all claims
 2 against Defendant SCORE other than those based on state tort law. Specifically, as noted by
 3 the Court:
 4

5 The claims to be dismissed include the Third, Fourth, Seventh, Eighth, Ninth,
 6 Tenth, Eleventh, Twelfth, Thirteenth, and Fourteenth claims in Plaintiffs'
 7 First Amended Complaint, Dkt. 49, to the extent they relate to SCORE and
 8 the individually named SCORE Employee Defendants. The Seventh Claim
 9 for relief is pled against all entity and individual defendants and the Tenth
 Claim for Relief is pled against SCORE and NaphCare, but this order does
 not affect those Claims for Relief against NaphCare or NaphCare Employee
 Defendants because they are not a party to this partial compromise of claims.

10 *Order Granting Plaintiffs' Petition to Approve Partial Compromise of Claims Against*
 11 *SCORE, Dkt. No. 199* ("The parties shall file a stipulation dismissing the non-tort claims
 12 addressed in the agreement.").

13 Additionally, Plaintiffs and the SCORE Defendants have agreed to dismiss with
 14 prejudice any and all claims against all remaining individual SCORE Employee Defendants,
 15 so the state law tort claims that will remain are against SCORE only. The Court previously
 16 dismissed SCORE Employee Defendants Brandon Heath; Pedro Santos; Ethan Glover, and
 17 Colminton Allen. *See, Dkt. No. 157*. Thus, the following individual defendants shall be
 18 dismissed with prejudice: Penny Bartley; Jim Kelly; Todd Barker; Brittney Palmore; Mandi
 19 Jaramillo; William Woo; Benda Scott a/k/a Brenda Scott; Christopher Foy; Jane Dore; and
 20 Aaron Seipp.

21 IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs and the
 22 SCORE Defendants that all of the above-described claims may be dismissed with prejudice
 23 and without assessment by the Court of costs or attorneys' fees to either party.

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26 //

27 //

1 Dated: September 22, 2021

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7 Dated: September 22, 2021

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14 Dated: September 22, 2021

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21 Dated: September 22, 2021

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ORDER

PURSUANT TO THE FOREGOING STIPULATION, IT IS ORDERED that Plaintiffs' claims against the SCORE Defendants as described in the above Stipulations are dismissed with prejudice and without assessment by the Court of costs or attorneys' fees to either party.

DATED this 22nd day of September, 2021.



RICARDO S. MARTINEZ
CHIEF U.S. DISTRICT JUDGE